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## UNITED STATES DISTRICT COURT

## SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Criminal Case No.

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Plaintiff,

<u>INDICTMEN</u>T

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CARLOS FLORES (1),

v.

VANESSA HARO-ORTEGA (2),

Defendants.

Title 8, U.S.C., Sec. 1324(a)(2)(B)(ii) -Bringing in Illegal Aliens for Financial Gain; Title 18, U.S.C., Sec. 2 - Aiding and Abetting;

Title 8, U.S.C.,

Secs. 1324(a)(1)(A)(iii) and (v)(II) - Harboring Illegal Aliens and Aiding and Abetting

The grand jury charges:

## Count 1

On or about December 27, 2007, within the Southern District of California, defendants CARLOS FLORES and VANESSA HARO-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ramiro Villanueva-Perez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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KAREN P. HEWITT

United States Attorney

J.

BRESSLER

Assistant U.S. Attorney

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By:

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## Count 2

On or about December 27, 2007, within the Southern District of California, defendants CARLOS FLORES and VANESSA HARO-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ramiro Villanueva-Perez, had come to, entered and remained in the United States in violation of law, did conceal, harbor and shield from detection such alien in an Apartment located at 739 First Street, Apartment A, Calexico, California; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (v)(II).

DATED: January 9, 2008.

A TRUE BILL:

Foreperson

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